

1 Thomas E. Hill (SBN 100861)
thomas.hill@hklaw.com
2 Christina T. Tellado (SBN 298597)
christina.tellado@hklaw.com
3 HOLLAND & KNIGHT LLP
400 South Hope Street, 8th Floor
4 Los Angeles, California 90071
Telephone: (213) 896-2400
5 Facsimile: (213) 896-2450

6 Attorneys for Defendant
7 TESLA, INC.

8 *(Additional counsel listed on next page)*

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

13 Plaintiff,

14 v.

15 TESLA, INC.,

16 Defendant.

Case No. 3:23-cv-4984-JSC

**[PROPOSED] ORDER GRANTING
DEFENDANT TESLA, INC.'S MOTION
TO STAY ALL PROCEEDINGS IN
LIGHT OF LONG-RUNNING,
CURRENTLY PENDING AND
VIRTUALLY IDENTICAL STATE
COURT LITIGATION**

Hearing Date: February 1, 2024

Time: 10:00 AM

Judge: Hon. Jacqueline Scott Corey

Courtroom: 8

Complaint Filed: September 28, 2023

*[Defendant's Notice of Motion and Motion;
Declarations of Sara A. Begley, Tiffany Hart,
Thomas E. Hill and Jessica Quon-Vail;
Request for Judicial Notice; and Exhibits in
Support of Motion, All Filed Concurrently
Herewith]*

Holland & Knight LLP
400 South Hope Street, 8th Floor
Los Angeles, CA 90071
Tel: 213.896.2400
Fax: 213.896.2450

1 Sara A. Begley (*admitted pro hac vice*)
sara.begley@hklaw.com
2 HOLLAND & KNIGHT LLP
1650 Market Street, Suite 3300
3 Philadelphia, Pennsylvania 19103
Telephone: (215) 252-9600
4 Facsimile: (215) 867-6070

5 Samuel J. Stone (SBN 317013)
sam.stone@hklaw.com
6 Mary T. Vu (SBN 323088)
mary.vu@hklaw.com
7 HOLLAND & KNIGHT LLP
400 South Hope Street, 8th Floor
8 Los Angeles, California 90071
Telephone: (213) 896-2400
9 Facsimile: (213) 896-2450

10 Raymond A. Cardozo (SBN 173263)
rcardozo@reedsmith.com
11 REED SMITH LLP
101 Second Street, Suite 1800
12 San Francisco, California 94105-3659
Telephone: (415) 543-8700
13 Facsimile: (415) 391-8269

14 Tyree P. Jones Jr. (SBN 127631)
tpjones@reedsmith.com
15 REED SMITH LLP
1301 K Street, N.W., Suite 1000
16 Washington, DC 20005-3317
Telephone: (202) 414-9200
17 Facsimile: (202) 414-9299

18 Attorneys for Defendant TESLA, INC.
19
20
21
22
23
24
25
26
27
28

[PROPOSED] ORDER

The Court hereby GRANTS Defendant Tesla, Inc.’s Motion to Stay All Proceedings in this action pending resolution of the California state court actions in (1) *Department of Fair Employment and Housing v. Tesla, Inc.*, Alameda County Superior Court Case No. 22CV006830, and (2) *Vaughn, et al. v. Tesla, Inc., et al.*, Alameda County Superior Court Case No. RG17882082 (collectively, the “State Court Actions”). Defendant shall provide the Court updates regarding the status of the State Court Actions every 180 days following entry of this order.

IT IS SO ORDERED.

U.S. District Judge

Dated: _____, 2023.

Holland & Knight LLP
400 South Hope Street, 8th Floor
Los Angeles, CA 90071
Tel: 213.896.2400
Fax: 213.896.2450

Submitted by:

HOLLAND & KNIGHT LLP

By: /s/ Thomas E. Hill
Thomas E. Hill
Attorneys for Defendant
TESLA, INC.

Holland & Knight LLP
400 South Hope Street, 8th Floor
Los Angeles, CA 90071
Tel: 213.896.2400
Fax: 213.896.2450